

Exhibit 37

Page 1

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

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IN RE: JOHNSON & JOHNSON	§ MDL No.
TALCUM POWDER PRODUCTS	§ 16-2738 (FLW) (LHG)
MARKETING, SALES PRACTICES,	§
AND PRODUCTS LIABILITY	§
LITIGATION	§
	§
-----§	
THIS DOCUMENT RELATES TO:	§
	§
TAMARA NEWSOME and DANIEL	§ Case No.
FRANCOIS,	§ 3:18-cv-17146-FLW-LHG
	§
Plaintiff,	§
	§
vs.	§
	§
JOHNSON & JOHNSON, et al.,	§
	§
Defendants.	§
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WEDNESDAY, DECEMBER 9, 2020

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This is the Remote Videotaped Deposition of
TAMARA NEWSOME, commencing at 10:01 a.m., on the
above date, before Kelly J. Lawton, Registered
Professional Reporter, Licensed Court Reporter,
and Certified Court Reporter.

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GOLKOW LITIGATION SERVICES
877.370.3377 ph | 917.591.5672 fax
deps@golkow.com

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<p>1 APPEARANCES VIA REMOTE COUNSEL/ZOOM TECHNOLOGY: 2 BLASINGAME, BURCH, GARRARD & ASHLEY, P.C. 3 BY: LEANNA B. PITTARD, ESQUIRE 4 Lpittard@bbga.com 5 SARA SCHRAMM, ESQUIRE 6 Sschramm@bbga.com 7 440 College Avenue, Suite 320 8 Athens Georgia 30601 9 (706) 707-3497 10 Representing Plaintiff 11 12 SHOOK, HARDY & BACON, LLP 13 BY: LORI C. McGRODER, ESQUIRE 14 2555 Grand Boulevard 15 Kansas City, Missouri 64108 16 (816) 474-6550 17 lmcgroder@shb.com 18 Representing Defendant Johnson & Johnson 19 20 Also Present: 21 Melissa James, Videographer 22 Connie Lee, Notary 23 24 25</p>	<p>1 E X H I B I T S 2 (Attached to Transcript) 3 NEWSOME DEPOSITION EXHIBITS PAGE 4 Defense 8 July 6, 2011 Capital Women's Care 140 5 Medical Record - Bates Numbered 6 NEWSOMET_CAPI_C_MDR000008 through 7 NEWSOMET_CAPI_C_MDR0000010 8 9 Defense 9 November 7, 2013 Capital Women's 141 10 Care Medical Record - Bates 11 Numbered NEWSOMET_CAPI_C_MDR000011 12 through NEWSOMET_CAPI_C_MDR000014 13 Plaintiff 1 Photograph 193 14 Plaintiff 2 Photograph 193 15 Plaintiff 3 Photograph 195 16 Plaintiff 4 Photograph 196 17 18 19 20 21 22 23 24 25</p>
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<p>1 --- 2 I N D E X 3 --- 4 Testimony of: TAMARA NEWSOME 5 DIRECT EXAMINATION BY MS. McGRODER..... 6 6 CROSS-EXAMINATION BY MS. PITTARD..... 187 7 REDIRECT EXAMINATION BY MS. McGRODER..... 232 8 9 10 E X H I B I T S 11 (Attached to Transcript) 12 NEWSOME DEPOSITION EXHIBITS PAGE 13 Defense 1 Plaintiff Profile Form 15 14 Defense 2 July 8, 2020 Signed Declaration 16 15 Defense 3 Defendants Johnson & Johnson and 31 16 Johnson & Johnson Consumer Inc.'s 17 Notice of Video Conference Oral 18 Deposition of Tamara Newsome and 19 Subpoena Duces Tecum 20 Defense 4 Tamara Newsome's Handwritten Notes 36 21 Defense 5 Photographs - Johnson & Johnson's 38 22 Baby Power Bottles - Bates Numbered 23 NEWSOMET_REC000011 through 24 NEWSOMET_REC000017 25 26 Defense 6 16 Photographs - Johnson & Johnson 49 27 Baby Powder 28 Defense 7 Myriad Genetics - Genetic Test 120 29 Results Summary Information - Bates 30 Numbered NEWSOMET_REC000001 through 31 NEWSOMET_REC000010</p>	<p>1 --- 2 THE VIDEOGRAPHER: We are now on the record. 3 My name is Melissa James. I'm a videographer for 4 Golkow Litigation Services. 5 Today's date is December 9th, 2020, and the 6 time is 10:01 a.m. 7 This remote video deposition is being held in 8 the matter of In Regards: Johnson & Johnson, 9 Talcum Powder Products Marketing, Sales 10 Practices, and Products Liability Litigation, MDL 11 Number 16-2738, Tamara Newsome, et al, versus 12 Johnson & Johnson, et al, Number 3:18-cv-17146, 13 for the Court and the United States District 14 Court for the District of New Jersey. 15 The deponent is Tamara Newsome. 16 All parties to this deposition are appearing 17 remotely and have agreed to the witness being 18 sworn in remotely. 19 Due to the nature of remote reporting, please 20 pause briefly before speaking to ensure all 21 parties are heard completely. 22 Will counsel please identify themselves. 23 MS. McGRODER: This is Lori McGroder on 24 behalf of Johnson & Johnson. 25 MS. PITTARD: Leanna Pittard on behalf of</p>

<p style="text-align: right;">Page 218</p> <p>1 for a just a minute while she logs back on. 2 THE VIDEOGRAPHER: Okay. Stand by. 3 We are going off the record at 4:09 p.m. 4 (Recess from 4:09 until 4:18 p.m.) 5 THE VIDEOGRAPHER: We are on the record, 6 4:18 p.m. 7 BY MS. PITTARD: 8 Q. Ms. Newsome, we were talking about Johnson & 9 Johnson television commercials right before we went 10 off the record. 11 Can you describe to us what you remember 12 about those commercials? 13 A. So Johnson & Johnson's baby powder, you use 14 on your baby. The impression that I got, that it was 15 safe, it was pure or sterile because it was used on 16 babies. 17 Q. Okay. I'm sorry, I just can't hear what you 18 said. Did you say that it was pure and sterile? 19 A. That the impression that I got is that it was 20 pure, sterile because you could use it on babies and 21 so it was safe. 22 Q. Okay. Okay. 23 A. -- on my babies. 24 Q. You said you used it on your babies? 25 A. Yes, I did.</p>	<p style="text-align: right;">Page 220</p> <p>1 you're talking about, Leanna. Sorry. 2 MS. PITTARD: Okay. 3 BY MS. PITTARD: 4 Q. During the time of your youth from the time 5 of your menses around age 14 through the point in 6 time when you stopped using the talcum powder, did 7 you, yourself, ever purchase it? 8 A. Oh, yes. Yes, ma'am. 9 Q. Okay. And I'm sure during that time period 10 the price probably changed. 11 Can you give us an idea of what a bottle of 12 talcum powder cost between, you know, 1975 and the 13 point in time you stopped using it? 14 MS. McGRODER: Object to form. 15 A. From 1975, maybe a dollar or less than a 16 dollar, to -- depending on which size I bought, to 17 2014, '15, three, four dollars. 18 Q. Okay. All right. During that entire period 19 of time from 1975 and through sometime in 2015, did 20 you ever see a warning on the Johnson & Johnson baby 21 powder bottle that indicated that talc can cause 22 ovarian cancer? 23 MS. McGRODER: Objection to form. 24 A. No, I did not. 25 Q. If there had been a warning that said, "This</p>
<p style="text-align: right;">Page 219</p> <p>1 Q. And did your mother use it on you as a baby? 2 A. I believe so. Because when I talked to my 3 mother, she said, "I used it, too." 4 Q. Okay. We talked earlier about your use of 5 several different Johnson & Johnson products. We 6 talked about your use of Johnson's baby powder with 7 talc, we talked about your use of Johnson's baby 8 powder with cornstarch, and we talked about your use 9 of Shower to Shower. 10 Related exclusively to your use of talcum 11 powder, the Johnson's talcum powder, how long did you 12 use Johnson's baby powder with talcum powder in it 13 exclusively before you began using cornstarch? 14 MS. McGRODER: Object to form. 15 A. So probably from the time of my menses at age 16 14, and then I started to wean myself off of talcum 17 powder leaning more towards cornstarch baby powder 18 probably around 2004. 19 Q. But while you were using that cornstarch, did 20 you continue to use the talcum powder? 21 A. I went between both. 22 Q. Okay. During that time period, did you, 23 yourself, pay for the talcum powder? 24 MS. McGRODER: Object to form. 25 I'm just confused about what time period</p>	<p style="text-align: right;">Page 221</p> <p>1 product may cause ovarian cancer; don't use it on 2 your genital area," would you have used the talc in 3 your genital area? 4 MS. McGRODER: Object to form. 5 A. I wouldn't have used it at all. 6 Q. Would you have used it on your breasts? 7 MS. McGRODER: Object to form. 8 A. If it said it caused any kind of cancer, I 9 probably would not have used it at all. 10 Q. Who saw you use the baby product with talc in 11 it? 12 A. My mother, my husband, probably my son -- 13 especially when he was younger, and my daughter. 14 Q. Okay. Ms. McGroder showed you a copy of your 15 genetic testing that, I believe, if I recall 16 correctly, was dated in December of 2015. 17 Do you recall when you got the results of 18 those tests? 19 A. So the genetic test was in December, probably 20 mid-December, and I probably got a call early to 21 mid-January -- 22 Q. Okay. 23 A. -- stating that the genetic tests were 24 negative and didn't show no predisposition to any of 25 the cancers that it tested for, including ovarian</p>